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12 Attorneys for Plaintiff

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,) No. CR-07-0599 SBA
17 Plaintiff,) JOINT MOTION TO SET STATUS
18 v.) HEARING DATE ON OCTOBER 7, 2008
19 DARREN BROWN,) AND TO EXCLUDE TIME UNDER THE
20 Defendant.) SPEEDY TRIAL ACT
21 Date: October 7, 2008
22 Time: 9:00 a.m.
23 Court: Hon. Saundra B. Armstrong

24 The parties jointly request that this Court vacate the status hearing set for September 16,
25 2008, set a new status hearing in this matter on October 7, 2008 at 9:00 a.m., and exclude time
26 under the Speedy Trial Act between September 16, 2008 and October 7, 2008.

27 On September 2, 2008, at the status hearing in the above-captioned matter, the Court set
28 the next status hearing for September 16, 2008, as defense counsel requested certain discovery
from the Government. The Court also excluded time, pursuant to the Speedy Trial Act, between
September 2, 2008 and September 16, 2008 to allow for the effective preparation of counsel, as
defense counsel needed time to review the additional discovery. The Government has since
produced additional discovery to defense counsel, but defense counsel needs additional time to

1 review the discovery, discuss the discovery with the defendant, and determine whether there are
2 any motions to file.

3 The parties hereby jointly request that the Court vacate the status hearing set for
4 September 16, 2008 and reschedule the status hearing for October 7, 2008. The parties further
5 jointly request that the Court exclude time between September 16, 2008 and October 7, 2008
6 under the Speedy Trial Act for the reasons stated above and pursuant to 18 U.S.C. §
7 3161(h)(8)(B)(iv). The parties agree the ends of justice served by granting the request outweigh
8 the best interests of the public and the defendant in a speedy trial.

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10 DATED: September 12, 2008

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/s/

13 CHRISTINE Y. WONG
14 Assistant United States Attorney
Counsel for United States

/s/

JOYCE LEAVITT
Counsel for Darren Brown

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

11 UNITED STATES OF AMERICA,) No. CR-07-599 SBA
12 Plaintiff,) [PROPOSED] ORDER GRANTING JOINT
13 v.) MOTION TO SET STATUS HEARING
14 DARREN BROWN,) DATE ON OCTOBER 7, 2008 AND TO
15 Defendant.) EXCLUDE TIME UNDER THE SPEEDY
16) TRIAL ACT
17)
Date: October 7, 2008
Time: 9:00 a.m.
Court: Hon. Saundra B. Armstrong

19 The parties jointly requested that a status hearing in this matter be set on October 7, 2008,
20 and that time continue to be excluded under the Speedy Trial Act between September 16, 2008
21 and October 7, 2008 to allow for the effective preparation of counsel for the reasons set forth in
22 the parties' joint request. For these stated reasons, the Court finds that the ends of justice served
23 by granting the request outweigh the best interests of the public and the defendant in a speedy
24 trial. Good cause appearing therefor, and pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv),

25 **IT IS HEREBY ORDERED** that the status hearing in this matter is set for October 7,
26 2008 at 9:00 a.m., and that time between September 16, 2008 and October 7, 2008 is excluded

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JOINT MOTION TO SET STATUS HEARING ON OCTOBER 7, 2008 AND TO EXCLUDE TIME
No. CR-07-0599 SBA

1 under the Speedy Trial Act to allow for the effective preparation of counsel, taking into account
2 the exercise of due diligence.

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4 DATED: _____
5 HON. SAUNDRA BROWN ARMSTRONG
6 United States District Judge
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